

EXHIBIT 01

From: [Roark, Brian](#)
To: [Sweet, Kara \(USATNM\)](#); [Robert S. Salcido \(rsalcido@akingump.com\)](#); [Sample, Taylor M.](#); [Chenery, Taylor](#); [Webber, Hannah E.](#); [Grizzle, Anna](#)
Cc: [Shuford, Wynn \(USATNM\)](#); [Lopes, Liz \(USATNM\)](#); [Seth Hyatt](#); [bryanvroon@gmail.com](#); [Jerry Martin](#); [Edward Robertson](#)
Subject: [EXTERNAL] RE: US Supplemental Objections and Responses to Document Requests
Date: Tuesday, January 17, 2023 4:57:34 PM
Attachments: [image001.png](#)

Kara,

We do not believe that the stipulation provided by the United States for Requests 26 and 27 adequately satisfies the United States' obligations for these two requests. The statement that you note from the 12/20 hearing about a stipulation was made prior to Andrew Solinger raising that specific individuals attending presentations already had been identified for the government by West, and the Court agreed that those custodians would be an appropriate starting point for searching for documents. We believe further inquiry is warranted here. We can discuss when we meet to confer regarding other issues.

Thanks.
Brian

From: Sweet, Kara (USATNM) <Kara.Sweet@usdoj.gov>
Sent: Friday, January 13, 2023 10:51 AM
To: Roark, Brian <BRoark@bassberry.com>; Robert S. Salcido (rsalcido@akingump.com) <rsalcido@akingump.com>; Sample, Taylor M. <taylor.sample@bassberry.com>; Chenery, Taylor <TChenery@bassberry.com>; Webber, Hannah E. <hannah.webber@bassberry.com>; Grizzle, Anna <agrizzle@bassberry.com>
Cc: Shuford, Wynn (USATNM) <Wynn.Shuford@usdoj.gov>; Lopes, Liz (USATNM) <Liz.Lopes@usdoj.gov>; Seth Hyatt <shyatt@barrettjohnston.com>; bryanvroon@gmail.com; Jerry Martin <jmartin@barrettjohnston.com>; Edward Robertson <chip.robertson@me.com>
Subject: US Supplemental Objections and Responses to Document Requests

All:

Please see the attached.

Beyond the date and signature block, the only changes are to Requests 26 and 27.

Have a good weekend,
Kara



Kara F. Sweet
Assistant U.S. Attorney
Middle District of Tennessee

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